

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA

- v. -

EVGENY BURYAKOV,

Defendant.

15 CR. 73 (RMB)

**NOTICE OF MOTION TO DISMISS THE INDICTMENT
AND FOR A BILL OF PARTICULARS**

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law, dated June 11, 2015, the accompanying Declaration of Scott Hershman, dated June 11, 2015, and the exhibits attached thereto, Defendant Evgeny Buryakov will move this Court, before the Honorable Richard M. Berman, United States District Judge, located at the United States Courthouse, 500 Pearl Street, Courtroom 17B, at **11:00 a.m. on July 23, 2015**, for an Order dismissing the Indictment in the above-captioned action under Rule 12(b)(3)(B)(v) of the Federal Rules of Criminal Procedure, and, if the Indictment is not dismissed, for an order requiring the Government to provide a Bill of Particulars in the above-captioned action under Rule 7(f) of the Federal Rules of Criminal Procedure.

PLEASE TAKE FURTHER NOTICE that opposition papers, if any, shall be filed by July 2, 2015, and reply papers, if any, shall be filed by July 14, 2015.

PLEASE TAKE FURTHER NOTICE that Defendant respectfully requests that oral argument be heard on the motions.

Dated: June 11, 2015
New York, New York

Respectfully submitted,

/s/ Scott Hershman

Scott Hershman

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